

BUSINESS SUSTAINABILITY REPORTING

Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 [SEBI (LODR) Regulations], with amendments to Regulation 34(2)(f) of LODR Regulations vide Gazette notification no. SEBI/LAD-NRO/GN/2021/22 dated May 05, 2021 introduced New reporting requirements on ESG parameters called the Business Responsibility and Sustainability Report (BRSR). Top 1000 companies, measured based on average Market Capitalization during the period from 1st July to 31st December, are required to have “Business Responsibility & Sustainability Report” (BRSR) as part of their Directors’ Report.

This regulation is not mandatorily applicable for the company for FY25, since the company is placed at 1087th and 1113rd position as per NSE’s data and BSE’s date respectively on average market capitalization during 01.07.2024 - 31.12.2024. However, the company has opted to comply with this regulation on voluntary basis for FY25 and the Company has accordingly drafted the Business Sustainability Report for FY25.

SECTION A: GENERAL DISCLOSURES

I. Details of the listed entity:

1. Corporate Identity Number (CIN) of the Listed Entity	L21012TZ1960PLC000364
2. Name of the Listed Entity	Seshasayee Paper and Boards Limited
3. Year of incorporation	22 nd June 1960
4. Registered Office address	Pallipalayam, Namakkal District, Cauvery RS PO, Erode 638 007, Tamil Nadu
5. Corporate address	Pallipalayam, Namakkal District, Cauvery RS PO, Erode 638 007, Tamil Nadu
6. E-mail	secretarial@spbltd.com
7. Telephone	04288 240322
8. Website	www.spbltd.com
9. Financial year for which reporting is being done	FY 2024-25
10. Name of the Stock Exchange(s) where shares are listed	NSE & BSE
11. Paid-up Capital	₹12,61,36,280
12. Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on this report	Sri S Srinivas Director (Finance) & Secretary

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13. Reporting boundary - Are the disclosures under this report made on a standalone basis (i.e. only for the entity) or on a consolidated basis (i.e. for the entity and all the entities which form a part of its consolidated financial statements, taken together):	Standalone
14. Name of assurance Provider	Not Applicable
15. Type of assurance obtained	Not Applicable

II. Products/ Services:

1. Details of business activities (accounting for 90% of the turnover):

Sl. No.	Description of Main Activity	Description of Business Activity	% of Turnover of the entity
1	Manufacturing	Manufacture of Paper and Paper Boards	97%

2. Products / Services sold by the entity (accounting for 90% of the entity's Turnover):

Sl. No.	Product/Service	NIC Code	% of total Turnover contributed
1	Paper and Paper Boards	1701	97%

III. Operations:

1. Number of locations where plants and/or operations/offices of the entity are situated:

Location	Number of plants	Number of offices	Total
National	3	8	11
International	--	--	--

2. Markets served by the entity in FY 2024-25:

a. Number of locations

Locations	Number
National (No. of States)	23
International (No. of Countries)	37

b. What is the contribution of exports as a percentage of the total turnover of the entity?

Exports during the FY 2024-25 represented 14% by value (Previous Year - 12%)

c. A brief on types of customers:

Mostly Business-to-Business (B2B): Printers, Publishers, Notebook convertors, Packaging Material convertors and to retail markets.

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IV. Employees

1. Details as at the end of Financial Year:

a. Employees and workers (including differently abled):

Sl. No	Particulars	Total (A)	Male		Female	
			No.(B)	% (B/A)	No.(C)	% (C/A)
Employees						
1.	Permanent (D)	738	725	98.2%	13	1.8%
2.	Other than Permanent (E)	330	322	97.6%	8	2.4%
3.	Total employees (D+E)	1068	1047	98.0%	21	2.0%
Workers						
4.	Permanent (F)	285	285	100.0%	--	0.0%
5.	Other than Permanent (G)	* 1318	* 1131	85.8%	* 187	14.2%
6.	Total employees (F+G)	1603	1416	88.3%	187	11.7%

* Includes 1225 workmen engaged on contract basis (1038 Male and 187 Female).

b. Differently abled Employees and workers:

Sl. No	Particulars	Total (A)	Male		Female	
			No.(B)	% (B/A)	No.(C)	% (C/A)
Differently Abled Employees						
1.	Permanent (D)	6	6	100%	--	--
2.	Other than Permanent (E)	--	--	--	--	--
3.	Total employees (D+E)	6	6	100%	--	--
Differently Abled Workers						
4.	Permanent (F)	3	3	100%	--	--
5.	Other than Permanent (G)	--	--	--	--	--
6.	Total employees(F+G)	3	3	100%	--	--

2. Participation / Inclusion / Representation of women:

	Total (A)	No. and percentage of Females	
		No. (B)	% (B / A)
Board of Directors	9	1	11.1 %
Key Management Personnel	1	--	--

3. Turnover rate for permanent employees and workers:

(Disclose trends for the past 3 years)

	FY 2024-25			FY 2023-24			FY 2022-23		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Permanent Employees	4.3%	--	4.3%	4.1%	10.0%	4.2%	7.7%	9.1%	7.7%
Permanent Workers	6.3%	--	6.3%	2.0%	--	2.0%	3.9%	--	3.9%

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V. Holding, Subsidiary and Associate Companies (including joint ventures):

(a) Names of holding / subsidiary / associate companies / joint ventures

Sl. No.	Name of the holding/ subsidiary / associate companies / joint ventures (A)	Indicate whether holding/ Subsidiary/ Associate/ Joint Venture	% of shares held by listed entity	Does the entity indicated at column A, participate in the Business Responsibility initiatives of the listed entity? (Yes/No)
1	Esvi International (Engineers & Exporters) Limited	Subsidiary	100.00%	No
2	Ponni Sugars (Erode) Limited	Associate	32.35%	Yes

VI. CSR Details:

- (i) Whether CSR is applicable as per section 135 of Companies Act, 2013 : Yes
- (ii) Turnover for FY 2024-25 - ₹ 1754.11 Crores
- (iii) Net worth as on 31.03.2025 - ₹ 1911.91 Crores
- (iv) CSR Spend during FY 2024-25 - ₹ 6.76 crores

VII. Transparency and Disclosures Compliances:

Complaints / Grievances on any of the principles (Principles 1 to 9) under the National Guidelines on Responsible Business Conduct:

Stakeholder group from whom complaint is received	Grievance Redressal Mechanism in Place (Yes/No)	FY 2024-25			FY 2023-24		
		Number of complaints filed	Number of complaints pending resolution	Remarks	Number of complaints	Number of complaints pending resolution	Remarks
Communities	Yes ⁽¹⁾	--	--		--	--	
Investors		Not Applicable					
Shareholders	Yes ⁽²⁾	1	--		1	--	
Employees and workers	Yes	--	--		--	--	
Customers	Yes ⁽³⁾	73	6		77	3	
Value Chain Partners	Yes ⁽⁴⁾	--	--		--	--	

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- (1) Addressed thro' the CSR Policy of the Company [<https://www.spbltd.com/investor-info/policy/index.html>].
- (2) As per SEBI Listing Regulations.
- (3) Covered in contracts and agreements entered into with the distributors (Indentors), dealers, agents and customers of the Company.
- (4) Addressed under the Whistle Blower Policy of the Company [<https://www.spbltd.com/investor-info/policy/index.html>].

2. Overview of the entity's material responsible business conduct issues

Please indicate material responsible business conduct and sustainability issues pertaining to environmental and social matters that present a risk or an opportunity to your business, rationale for identifying the same, approach to adapt or mitigate the risk along-with its financial implications, as per the following format.

Sl. No.	Material issue identified	Indicate whether risk or opportunity	Rationale for identifying the risk / opportunity. In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity
1	Printing and writing paper segment which is the prime grade among company's products, is expected to be negatively impacted in the near future.	Opportunity & Risk	<p>Risk: Will affect the margins business that the Company operates.</p> <p>Opportunity:</p> <ol style="list-style-type: none"> (i) Provides opportunity to diversify in to other product range to cater to different segments of markets. (ii) To take advantage of restrictions on single use plastic materials, by developing alternatives. <p>The Company has been making necessary investments to diversify its product range and has also been strengthening its marketing network, as well as the supply chain.</p>	Adverse since margins of alternate grades are likely to be lower when compared with printing and writing segment.
2	Failure of Monsoon and absence of water flow in the River Cauvery and River Tamirabarani, from where the Company draws its water requirements	Risk	<p>Risk: Since water shortage will directly disrupt the pulp and paper production.</p> <p>The Company is taking various initiatives to curtail quantum of fresh water used in the process, by applying reduce, reuse and recycle method.</p>	Adverse

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Sl. No.	Material issue identified	Indicate whether risk or opportunity	Rationale for identifying the risk / opportunity. In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity
3	Wood availability	Risk	<p>Risk: Since wood pulp constitutes the major portion in the pulp furnish of the paper manufacturing in the Company. The Company has well defined tree farming strategy to enable marginal land owners in nearby districts to grow trees in about 20000 acres annually. This enables Company to be wood positive.</p> <p>This risk is further addressed thro' a 4 pronged strategy :</p> <ul style="list-style-type: none"> - Adding Newer species of wood to its raw material base - Enhancing the sourcing of wood from regions outside Tamil Nadu - Direct connect with Farmers thro' Contract Farming initiatives - Enhancing usage of bagasse & deinked pulp to reduce dependency on wood pulp. 	Negative since shortage of wood will result in company resorting to use of costlier sourced pulp.
4	Dependency on Imported Coal	Opportunity & Risk	<p>Risk: Since this results in increase in energy cost.</p> <p>Opportunity: Since this opens up avenues to move towards non-fossil fuel based energy sources.</p> <p>The company has continuously taken steps to reduce its dependency on Coal.</p> <p>Today, 61% of the energy needs of the Unit : Erode is addressed thro' renewable energy sources and bio-fuels. Further steps are being taken to increase the share by augmenting in-house pulp production.</p> <p>The Company has also partnered with a Solar & Wind Power facilities developer, for meeting the Solar & Wind Power requirements of the company.</p>	Neutral since the company's dependency on Coal has come down.

Sl.	Disclosure Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
Policy and Management Processes										
1	a. Whether your entity's policy / policies cover each principle and its core elements of the NGRBCs. (Yes / No)	Y	Y	Y	Y	Y	Y	Y	Y	Y
	b. Has the policy been approved by the Board? (Yes/No)	Y	--	--	Y	Y	--	Y	Y	--
	c. Web Link of the Policies, if available	All the policies are available @ https://www.spbltd.com/investor-info/policy/index.html								

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Governance, leadership and oversight

7	<p>Statement by director responsible for the business responsibility report, highlighting ESG related challenges, targets and achievements :</p> <p>“SPB is committed to be a truly sustainable and socially responsible business. The Company's ESG roadmap and Green initiatives / targets have been integrated with the Growth Strategy of the business.”</p> <p>Sri. N Gopalaratnam Excutive Chairman Wholetime Director & KMP</p>	
8	<p>Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy (ies).</p>	<p>The Executive Chairman, who is also the wholetime director & KMP of the Company</p>
9	<p>Does the entity have a specified Committee of the Board / Director responsible for decision making on Sustainability related issues? (Yes / No). If yes, provide details.</p>	<p>Yes, the Executive Chairman of the Company is responsible for decision making on sustainability related issues.</p>

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10	Details of Review of NGRBCs by the Company:																			
	Subject for Review	Indicate whether review was undertaken by Director / Committee of the Board/ Any other Committee									Frequency (Annually/ Half yearly/ Quarterly/ Any other - please specify)									
		P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	
		1	2	3	4	5	6	7	8	9	1	2	3	4	5	6	7	8	9	
	Performance against above policies and follow up action	Yes									Annually									
	Compliance with statutory requirements of relevance to the principles, and, rectification of any non-compliances	The company complies with all applicable laws.																		
11	Has the entity carried out independent assessment/evaluation of the working of its policies by an external agency? (Yes/No). If yes, provide name of the agency.	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9										
		The Auditors of the Company (ISO Auditors / Internal Auditors / In-house ISO and WCM co-ordinators / In-house Certified Energy Auditors / FSC Auditors) review the implementation of the policies from time to time. The Company's 2 units have been subject to audit by external certification agencies. No dedicated Business Responsibility Audit has been conducted.																		
12	If answer to question (1) above is "No" i.e. not all Principles are covered by a policy, reasons to be stated: NA																			
	The entity does not consider the Principles material to its business (Yes/No)	Not applicable																		
	The entity is not at a stage where it is in a position to formulate and implement the policies on specified principles (Yes/No)	Not applicable																		
	The entity does not have the financial or/human and technical resources available for the task (Yes/No)	Not applicable																		
	It is planned to be done in the next financial year (Yes/No)	Not applicable																		
	Any other reason (please specify)	Not applicable																		

SECTION C: PRINCIPLE WISE PERFORMANCE DISCLOSURE

This section is aimed at helping entities demonstrate their performance in integrating the Principles and Core Elements with key processes and decisions. The information sought is categorized as “Essential” and “Leadership”. While the essential indicators are expected to be disclosed by every entity that is mandated to file this report, the leadership indicators may be voluntarily disclosed by entities which aspire to progress to a higher level in their quest to be socially, environmentally and ethically responsible.

PRINCIPLE 1: Businesses should conduct and govern themselves with integrity, and in a manner that is Ethical, Transparent and Accountable.

- ◇ Commitment to ethical and lawful business conduct is a fundamental shared value of the Board of Directors, Senior Management and all employees of the Company. It is embedded in the Company's Vision, Mission and Values Statement. The Values of the Company, as in this statement, start with “Ethical Practices”. The Company's Vision is “To excel as a trusted, socially responsible and customer driven organisation providing maximum value to all stakeholders.”
- ◇ The Company has adopted the ‘Code of Conduct’, to ensure ethics, transparency and accountability in all aspects of the business and create value for its stakeholders in a sustainable manner. All Directors and Senior Management personnel shall affirm compliance with Code on an annual basis.
- ◇ The Company has well established policies, in accordance with the statutory guidelines and relevant SEBI regulations.
 - ❖ Whistle Blower policy
 - ❖ Code of Conduct
 - ❖ Code of practices for fair disclosure of unpublished price sensitive information.
 - ❖ Remuneration policy.
 - ❖ Policy on preservation and archival of documents.
 - ❖ Policy for determination of Materiality for Disclosure of Information / Events to Stock Exchanges.
 - ❖ Policy on Related Party transactions
 - ❖ Policy for determining Material subsidiaries.
 - ❖ Prevention of Sexual Harassment at Workplace
 - ❖ The Company has a policy to do business with suppliers / contractors and other who are aligned with its value systems.

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Essential Indicators					
1	Percentage coverage by training and awareness programmes on any of the Principles during the financial year:				
	Segment	Total number of training and awareness programmes held	Topics / principles covered under the training and its impact	% age of persons in respective category covered by the awareness programmes	
	Board of Directors	The Directors of the Company are given extensive information thro' Plant Visit(s), periodical updates and detailed presentations, on the Regulatory updates including MCA updates on amendments to Companies Act, 2013, SEBI Regulations, amendments to FEMA, Related Party Transactions, etc., Industry updates, market developments, energy initiatives thro' Business Presentations etc.			
	Key Managerial Personnel	The Company has dedicated periodical Internal Company Newsletter (GreenCo Newsletter) covering a variety of resources, including training programs, awareness campaigns, leader talks, contests and more. The learning content addresses the BRSR topics. The Company conducts campaigns throughout the year to encourage employees leverage their learnings.			
	Other Employees				
	Workers	The GreenCo Newsletters of the Company are also available @ www.spbltd.com			
2	Details of fines / penalties / punishment / award / compounding fees/ settlement amount paid in proceedings (by the entity or by directors / KMPs) with regulators/ law enforcement agencies/ judicial institutions, in the financial year, in the following format (Note: the entity shall make disclosures on the basis of materiality as specified in Regulation 30 of SEBI (Listing Obligations and Disclosure Obligations) Regulations, 2015 and as disclosed on the entity's website):				
	Monetary				
	NGRBC Principle	Name of the regulatory/ enforcement agencies/ judicial institutions	Amount (in INR)	Brief of the Case	Has an appeal been preferred (Yes/ No)
	Penalty / Fine	None			
	Settlement				
	Compounding fee				
	Non-Monetary				
	Imprisonment	None			
	Punishment				

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- 3 Of the instances disclosed in Question 2 above, details of the Appeal / Revision preferred in cases where monetary or non-monetary action has been appealed.**

Case Details	Name of the regulatory/ enforcement agencies/ judicial institutions
Nil	Nil

- 4 Does the entity have an anti-corruption or anti-bribery policy? If yes, provide details in brief and if available, provide a web-link to the policy.**

The Company has adopted the 'Code of Conduct', to ensure ethics, transparency and accountability in all aspects of the business and create value for its stakeholders in a sustainable manner [<https://www.spbltd.com/investor-info/code-of-conduct/index.html>]. All Directors and Senior Management personnel affirm compliance with Code on an annual basis.

- 5 Number of Directors / KMPs / employees / workers against whom disciplinary action was taken by any law enforcement agency for the charges of bribery / corruption:**

	FY 2024-25	FY 2023-24
Directors	There have been no cases involving disciplinary action taken by any law enforcement agency for the charges of bribery / corruption against Directors / KMP / employees / workers that have been brought to our attention.	
KMPs		
Employees		
Workers		

- 6 Details of complaints with regard to conflict of interest:**

	FY 2024-25		FY 2023-24	
	Number	Remarks	Number	Remarks
Number of complaints received in relation to issues of Conflict of Interest of the Directors / KMPs.		None		

- 7 Provide details of any corrective action taken or underway on issues related to fines / penalties / action taken by regulators/ law enforcement agencies/ judicial institutions, on cases of corruption and conflicts of interest - None.**

- 8 Number of days of accounts payables ((Accounts payable *365) / Cost of goods / services procured) in the following format:**

	FY 2024-25	FY 2023-24
Number of days of accounts payables	47 days	60 days

- 9 Open-ness of business**

Provide details of concentration of purchases and sales with trading houses, dealers, and related parties along-with loans and advances & investments, with related parties, in the following format:

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Parameter	Metrics	FY2024-25	FY2023-24
Concentration of Purchases	a) Purchases from trading houses as % of total purchases	68%	60%
	b) Number of trading houses where purchases are made from	686	675
	c) Purchases from top 10 trading houses as % of total purchases from trading houses	61%	70%
Concentration of Sales	a) Sales to dealers / distributors as % of total sales	70%	93%
	b) Number of dealers / distributors to whom sales are made	74	94
	c) Sales to top 10 dealers / distributors as % of total sales to dealers / distributors	51%	44%
Share of RPTs in	a) Purchases (Purchases with related parties / Total Purchases)	1.5%	1.6%
	b) Sales (Sales to related parties / Total Sales)	0.1%	0.1%
	c) Loans & advances (Loans & advances given to related parties/ Total loans & advances)	--	--
	d) Investments (Investments in related parties / Total Investments made)	[^] 98%	[^] 97%

[^] % arrived at based on Historical cost of investment and not fair-value

Leadership Indicators

1 Awareness programmes conducted for value chain partners on any of the Principles during the financial year:

The Company facilitates capacity building workshops for its key value chain partners to educate and create shared awareness on key areas like Human Rights, labour practices and sustainability.

2 Does the entity have processes in place to avoid / manage conflict of interests involving members of the Board? (Yes / No). If Yes, provide details of the same. Policy on related party transactions.

Yes. The Company receives an annual declaration from its Board of Directors and KMP on the entities they are interested in and ensures requisite approvals as required under the statute as well as Company's policies are in place before transacting with such entities and individuals

PRINCIPLE 2: Businesses should provide goods and services in a manner that is sustainable and safe.

- ✦ Paper is a noble Product. The printing and writing grades of paper that our Company manufactures go to educate Children and inculcate good reading habits. Paper is biodegradable, recyclable and an environmentally friendly product. Process of manufacture of paper is clean, green and energy efficient.
- ✦ Our company manufactures different grades of printing and writing paper using
 - Plantation / Farm forestry based wood
 - Sugar cane bagasse [a by-product of a Sugar Mill] and
 - Recycled waste paper.

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- ✦ Our company helps farmers to grow trees. As part of our tree farming activity, our company provides quality Clonal seedlings / bare root seedlings of Eucalyptus and Casuarina at subsidized rates to farmers and also assist them with technical help to achieve higher yields and revenues.
- ✦ Our company is constantly focused on identifying new wood species.
- ✦ Technical support to the farmers for this initiative is being provided in association with the Department of Tree Breeding of Forest College and Research Institute, attached to Tamil Nadu Agricultural University, Coimbatore, through a Collaborative Research Project.
- ✦ In accordance with the Company's vision to achieve wood positive status, over 7.90 crore seedlings were made available during the FY 2024-25 (FY 2023-24 : 20.4 crore seedlings), at subsidized rates, for planting in 20,772 acres of land in FY 2024-25 (FY 2023-24 : 24,764 acres).
- ✦ Our Unit : Tirunelveli has a modern De-inking Plant in which recycled waste paper is de-inked (removal of ink) and reused for manufacture of high quality printing and writing paper grades.
- ✦ As can be seen from the above, the three primary fibrous raw materials viz. Wood, Sugar cane Bagasse and Waste Paper are obtained through a sustainable process model helping the local community.
- ✦ The paper manufacturing process adopted by our company is also environmentally friendly and green. Our process is energy efficient and totally "Elemental Chlorine Free". Our process uses environmentally friendly chemicals viz. Oxygen, Hydrogen Peroxide, Chlorine Di-oxide, etc. which make our process green. The process adopted by our company generates a liquor called "Black Liquor" which is a biomass rich in lignin is burnt in a boiler to produce green power.
- ✦ Nearly 61% of the energy consumed by Unit : Erode is green power generated from 'Black Liquor' in the Chemical Recovery Complex and bio-fuels used in our Power Boilers. Nearly 96% of the Chemicals used in pulping process are recovered back in the Chemical Recovery Complex and recycled.
- ✦ The Lime Sludge which is a waste product from our Recalcitrating Plant is reburnt in a Rotary Lime Kiln which again uses about 20% biogas from the Anaerobic Digestion System.
- ✦ The solid waste viz. effluent sludge from waste water treatment plant is the primary raw material for hundreds of small board manufacturers and the board produced is used for Egg tray, Hosiery packing, Footwear packing, etc.
- ✦ Our company has a unique waste water treatment facility. The waste water from the Mill is classified into three categories viz. (i) High COD, (ii) Medium COD & (iii) Low COD.
- ✦ The high COD stream is taken to Anaerobic Lagoon which generates Methane gas which is used in Rotary Lime Kiln to replace fossil fuel viz. Furnace Oil.
- ✦ The low COD stream is taken to Clarifier and is recycled back in the process.
- ✦ The medium COD stream is treated in the waste water treatment facility meeting the standards prescribed by the Pollution Control Board and the treated waste water is used for irrigating the waste land around the Mill through Lift Irrigation Scheme.
- ✦ Our company has bagged several awards for excellent Environment performance, safety, energy efficiency, etc. Notable Awards received by the Company in recent years are:
 - CII GreenCo Gold Rating Award during GreenCo Summit held at Pune in the year 2017.
 - Green Award 2017 by Tamil Nadu Pollution Control Board for Environment Protection.
 - CII - National Award for Excellence in Energy Management:

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- a) Excellence in Energy Management - for the past 7 consecutive years
- b) National Energy Leader - 5th time in row
- c) Innovation award - Digester modification to enhance pulp production and green energy.
- Paper Mill of the year award for FY 2019-20, awarded by Indian Paper Manufacturers Association.
- IPMA Energy Conservation Award for FY 2021-22.
- CII EHS (Environmental, Health and Safety) Excellence - Bronze Award for the year 2022.
- AEE award - Regional Corporate Energy award 2021 by Association of Energy Engineers, US
- CAPEXIL Export Excellence Award for FY 2018-2022
- CII SR EHS Excellence - Silver Award for the year 2023
- CII EHS Excellence - Special award in Energy / Carbon footprint for the year 2023.

Essential Indicators

1 Percentage of R&D and capital expenditure (capex) investments in specific technologies to improve the environmental and social impacts of product and processes to total R&D and capex investments made by the entity, respectively.

	FY 2024-25 (₹ crores)	FY 2023-24 (₹ crores)
R&D (Revenue)	1.05	1.03
R&D (Capex)	0.34	0.25

Details of improvements in environmental and social impacts:

Wood being the most important and sensitive raw material, the company helps farmers to grow trees and a large part of the Company's R&D programs supports farmers. As part of the tree farming activity, the company runs nursery in large scale and provides quality Clonal seedlings of Eucalyptus and Casuarina breed at subsidized rates to farmers and also assist them with technical help through Agricultural University to achieve higher yields and revenues.

Our company is constantly focused on identifying new wood species. Recently the company has identified newer varieties of wood like Melia-Dubia and Subabul as wood suitable for pulp production.

Technical support to the farmers for this initiative is being provided in association with the Department of Tree Breeding of Forest College and Research Institute, attached to Tamil Nadu Agricultural University, Coimbatore, through a Collaborative Research Project.

Our company has a structured, innovative Lift Irrigation Scheme by which our treated waste water is used to irrigate nearly 1500 acres of land in which local farmers grow sugar cane. The sugar cane produced is procured by our associate Company viz. Ponni Sugars(Erode) Limited which in turn gives bagasse, a residue left after extraction of sugar from sugar cane. Bagasse is used by our Company to produce paper, and in turn, our Company gives treated waste water to the farmers to grow sugar cane. This tripartite arrangement between our Company, Ponni Sugars (Erode) Limited and the nearby Farmers has been in operation for over 35 years. This innovative Lift Irrigation Scheme is a unique and innovative irrigation scheme and has caught the attention of Overseas Experts and UNDP as a Role Model.

2 a. Does the entity have procedures in place for sustainable sourcing? Yes

b. If yes, what percentage of inputs were sourced sustainably?

Yes. The Company has been certified under four standards of FSC (Forest Stewardship Council), viz. FSC-STD-40-004 (Chain of Custody (COC) Certification), FSC-STD-40-005 (Requirements for Sourcing FSC Controlled Wood), FSC-STD-40-003 (COC certification of multiple sites) and FSC-STD-50-001 (Certificate Holder Trademark Requirements). By this, the Company assures its stakeholders that the wood and wood fibre (pulp) purchased by it are traceable to responsibly managed plantations and that adequate controls are in place to ensure identification and traceability throughout the Chain of Custody. This also means that the Company is capable of manufacturing and selling 'FSC Mix' claim products in Domestic and International Markets.

100% of wood sourced is from sustainable vendors. The Company's FSC Policy governing sourcing of wood is available at Company's website : <https://www.spbltd.com/investor-info/corporate-governance/index.html>

The Company policy on Green Procurement guidelines underlines the following :

- Sourcing of raw materials from Environmentally and socially responsible sources.
- Maximising the usage of Eco friendly chemicals and energy efficient equipments
- Maximising the use of recovered paper in paper furnish.
- Following the 3R principles of Reduce, Reuse and Recycle.
- Conducting awareness programs on Environmental impacts for vendors / suppliers.
- Creating awareness about GSC (Green Supply Chain) to critical vendors and to help them for ISO 14000 certification and to prioritise buying from ISO vendors.
- Improving the efficiency of the suppliers by audit, training and improvement suggestions.

Company's green procurement guidelines are available in Company's website @ <https://www.spbltd.com/investor-info/policy/index.html>.

3 Describe the processes in place to safely reclaim your products for reusing, recycling and disposing at the end of life, for (a) Plastics (including packaging) (b) E-waste (c) Hazardous waste and (d) other waste.

The plastic waste, mainly generated from the de-inking process of waste paper, is disposed for co-processing in Cement Kiln thro' an agreement.

The Company has entered in to formal agreement with PCB approved e-waste vendors for disposal of e-waste.

Company has identified waste oil and ETP sludge under Hazardous waste and imported waste paper as Other wastes. The Company has obtained authorization from TNPCB for its disposal and utilization.

Other waste generated in the process (like Chipper Dust, Pith, Screen rejects etc) are used as Biomass in the Company's Captive Power Plant. Lime Sludge / Lime Grits, generated in the process, are supplied as alternate raw material to nearby cement plants. Primary Sludge, generated in the process, is supplied as alternate material to Board making plants / egg-tray making facilities.

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- 4 Whether Extended Producer Responsibility (EPR) is applicable to the entity's activities (Yes / No). If yes, whether the waste collection plan is in line with the Extended Producer Responsibility (EPR) plan submitted to Pollution Control Boards? If not, provide steps taken to address the same.**

The EPR guidelines / regulations are applicable to the company. The Company has entered in to a formal agreement with an authorized service provider for collection & Disposal Of Plastic Waste Generated by the company On a Pan India Level. The program covers the following :

- EPR Report and certificate for collection, storage, transportation, recycling and disposal of Plastic waste.
- Fulfilment of EPR requirements of the COMPANY as per PWM 2016 (and its amendments), and respective state Rules.
- Implementation of the requirements under Central Government Notification {published on 18th March, 2016, in the Gazette of India, Part - II, Section -3, Sub-section (i)} by Ministry of Environment, Forest and Climate Change.
- Collection / Recycling data on the basis of requirement by the COMPANY/ or Central/ State Pollution Control Boards.
- Other EPR services as required.

Leadership Indicators

- 1 Has the entity conducted Life Cycle Perspective / Assessments (LCA) for any of its products (for manufacturing industry) or for its services (for service industry)? If yes, provide details in the following format?**

The Company has been undertaking Life Cycle Perspective Assessments (LCA) on its products since the year 2017 with an objective to evaluate the impacts and identify areas for improvement in the value chains. LCA has been carried out for 2 of the major product offerings of the company and these products have been assessed as environment friendly. The Company will continue with its efforts for assessing environmental impact of other products.

NIC Code	Name of Product / Service	% of total Turnover contributed	Boundary for which the Life Cycle Perspective/ Assessment was conducted	Whether conducted by independent external agency (Yes/No)	Results communicated in public domain (Yes/No)
1701	Super white & Copier Grades	20 - 30%	Gate to Gate	3 rd party and internal	No

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- 2 If there are any significant social or environmental concerns and/or risks arising from production or disposal of your products / services, as identified in the Life Cycle Perspective / Assessments (LCA) or through any other means, briefly describe the same along-with action taken to mitigate the same.**

The Company has put in place robust guidelines and standards, that are benchmarked against international best practices, with defined Standard Operating Procedures for identifying and mitigating social and environmental risks.

Name of Product / Service	Description of the risk / concern	Action Taken
NIL		

- 3 Percentage of recycled or reused input material to total material (by value) used in production (for manufacturing industry) or providing services (for service industry).**

Indicate input material	Recycled or re-used input material to total material	
	FY 2024-25	FY 2023-24
Unit : Erode - Integrated Pulp and Paper Unit	Erode unit uses Bagasse, which is a by-product in Sugar mills, to manufacture pulp and about 10% of total pulp manufactured in Erode unit is bagasse based	
Unit : Tirunelveli - Standalone Paper Unit - Usage of recycled fibre as a % of total fibre	14%	16%

- 4 Of the products and packaging reclaimed at end of life of products, amount reused, recycled, and safely disposed, as per the following format:**

	FY 2024-25			FY 2023-24		
	Re-Used	Recycled	Safely Disposed	Re-Used	Recycled	Safely Disposed
Plastics (including packaging)	--	--	909.9 MT	--	--	739.5 MT
E-waste	--	--	3.28 MT	--	--	0.92 MT
Hazardous waste (Used Spent Oil)	--	--	9 MT (approx.)	--	--	7 MT (approx.)
Hazardous waste (Chemical Sludge)	--	--	89685 MT	--	--	73928 MT
Other waste (ESP ash)	--	--	14586 MT	--	--	16575 MT

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5 Reclaimed products and their packaging materials (as percentage of products sold) for each product category.

Indicate product category	Reclaimed products and their packaging materials as % of total products sold in respective category
In Unit : Erode	About 9% of the pulp is from Bagasse, which is a by-product of the Sugar Industry.
In Unit : Tirunelveli	About 14% of the pulp furnish is from recovered paper.

PRINCIPLE 3: Businesses should respect and promote the well-being of all employees, including those in their value chains

Essential Indicators

1 a. Details of measures for the well-being of employees(other than workers):

% of employees covered by

Category	Total (A)	Health insurance		Accident insurance		Maternity benefits		Paternity Benefits		Day Care facilities	
		No.	%	No.	%	No.	%	No.	%	No.	%
Permanent Employees											
Male	725	168	23%	725	100%	NA	NA	0	0%	0	0%
Female	13	3	23%	13	100%	13	100%	NA	NA	0	0%
Total	738	171	23%	738	100%	13	2%	0	0%	0	0%
Other than Permanent employees											
Male	322	305	95%	322	100%	NA	NA	0	0%	0	0%
Female	8	8	100%	8	100%	0	0%	NA	NA	0	0%
Total	330	313	95%	330	100%	0	0%	0	0%	0	0%

b. Details of measures for the well-being of workers:

Permanent Workers

Category	Total (A)	Health insurance		Accident insurance		Maternity benefits		Paternity Benefits		Day Care facilities	
		No.	%	No.	%	No.	%	No.	%	No.	%
Male	285	0	0%	285	100%	NA	NA	0	0%	0	0%
Female	0	0	0%	0	0%	0	0%	NA	NA	0	0%
Total	285	0	0%	285	100%	0	0%	0	0%	0	0%

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Category	Total (A)	Health insurance		Accident insurance		Maternity benefits		Paternity Benefits		Day Care facilities	
		No.	%	No.	%	No.	%	No.	%	No.	%
Other than Permanent Workers											
Male	1131	1096	97%	1131	100%	NA	NA	0	0%	0	0%
Female	187	187	100%	187	100%	0	0%	NA	NA	0	0%
Total	1318	1283	97%	1318	100%	0	0%	0	0%	0	0%

c. Spending on measures towards well-being of employees and workers (including permanent and other than permanent) in the following format:

	FY 2024-25	FY 2023-24
Cost incurred on well-being measures as a % of total revenue of the Company	0.6 %	0.55 %

2 Details of retirement benefits, for Current FY and Previous Financial Year

Benefits	FY 2024-25			FY 2023-24		
	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/NA)	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/NA)
PF	100%	100%	Yes	100%	100%	Yes
Gratuity	100%	100%	Yes	100%	100%	Yes
ESI	14%	16%	Yes	14%	16%	Yes
Others ^^	82%	85%	Yes	82%	85%	Yes

The above retirement benefits are applicable only for permanent employees.

^^ Related to the exclusive Superannuation Program that the company offers to its employees.

3 Accessibility of workplaces

Are the premises / offices of the entity accessible to differently abled employees and workers, as per the requirements of the Rights of Persons with Disabilities Act, 2016? If not, whether any steps are being taken by the entity in this regard.

The establishments / offices of the company are accessible to differently abled employees and the management continuously works towards improving infrastructure for eliminating barriers to accessibility.

4 Does the entity have an equal opportunity policy as per the Rights of Persons with Disabilities Act, 2016? If so, provide a web-link to the policy.

Yes. The policy is available @ <https://www.spbltd.com/investor-info/policy/index.html>

5 Return to work and Retention rates of permanent employees and workers that took parental leave.

Gender	Permanent employees		Permanent workers	
	Return to work rate	Retention rate	Return to work rate	Retention rate
Male	NA	NA	NA	NA
Female	100%	100%	100%	100%
Total	100%	100%	100%	100%

6 Is there a mechanism available to receive and redress grievances for the following categories of employees and worker? If yes, give details of the mechanism in brief.

Yes. The Company's grievance redressal procedure is available to employees and workmen. The objective of the policy is to facilitate open and structured discussion on employees' work-related grievances with the intent of ensuring that the grievance is dealt with a fair and just manner while being in compliance with the company's policies. The company's practices encourage an amicable and fair resolution of grievances. Employees are encouraged to first discuss the grievance with their immediate reporting authority and attempt to arrive at a resolution before invoking a formal grievance redressal mechanism.

	Yes / No (If Yes, then give details of the mechanism in brief)
Permanent Workers	As mentioned above
Other than Permanent Workers	
Permanent Employees	
Other than Permanent Employees	

7 Membership of employees and worker in association(s) or Unions recognised by the listed entity:

Category	FY 2024-25			FY 2023-24		
	Total employee / workers	Part of association(s) or Union	%	Total employee / workers	Part of association(s) or Union	%
Total Permanent Employees	737	550	75%	725	570	79%
- Male	725	541	75%	715	561	78%
- Female	13	10	77%	10	8	80%
Total Permanent Workers	285	285	100%	301	301	100%
- Male	285	285	100%	301	301	100%
- Female	0	0	--	0	0	0

8 Details of training given to employees and workers:

Category	FY 2024-25					FY 2023-24				
	Total (A)	On Health and safety measures		On Skill upgradation		Total (A)	On Health and safety measures		On Skill upgradation	
		No. (B)	% (B/A)	No. (C)	% (C/A)		No. (E)	% (E/D)	No. (F)	% (F/D)
Employees										
Male	1047	608	58%	782	75%	1045	629	60%	775	74%
Female	21	16	76%	16	76%	19	12	63%	12	63%
Total	1068	624	58%	787	74%	1064	641	60%	787	74%
Workers										
Male	1416	162	11%	254	18%	1396	190	14%	255	18%
Female	187	0	0	0	0	150	0	0%	0	0%
Total	1603	162	10%	254	16%	1546	190	12%	255	16%

9 Details of performance and career development reviews of employees and worker:

Category	FY 2024-25			FY 2023-24		
	Total (A)	No. (B)	% (B/A)	Total (C)	No. (D)	% (D/C)
Employees						
Male	1047	725	69%	1045	583	56%
Female	21	13	62%	19	10	53%
Total	1068	738	69%	1064	593	56%
Workers						
Male	1416	285	20%	1396	255	18%
Female	187	--	--	150	--	--
Total	1603	285	18%	1546	255	16%

10 Health and safety management system:

a) Whether an occupational health and safety management system has been implemented by the entity? (Yes/ No). If yes, the coverage such system?

Yes. The Company has implemented Occupational, Health and Safety Management System. The company is certified since year 2007 under Occupational Health and Safety Assessment series 18001/45001 (OHSAS) which is an international standard that facilitates management of Occupational Health and Safety risks associated with the business of the organization.

b) What are the processes used to identify work-related hazards and assess risks on a routine and non-routine basis by the entity?

For Routine work : Hazard Identification and Risk Analysis (HIRA) is carried out for each activity, prescribed in SOPs (Standard Operating Procedures). Suitable Control measures are implemented.

For Non-routine work : Job Safety Analysis Tool is used to identify the hazards and risks involved in the job. Suitable control measures have been placed.

Further, both the units of the company undergo periodic Environment, Health and Safety audits. Several national awards and certifications acknowledge SPB's commitment and efforts towards providing a safe and healthy workplace to all.

c) Whether you have processes for workers to report the work related hazards and to remove themselves from such risks. (Y/N)

Yes. A system is in place in both the units of the company to spot and report work related hazards and offer suggestions for improvements. Necessary training is given to all employees in recognizing hazards and issues. Joint inspections by management representatives and employees on the shop floor are also carried out at regular intervals and respective corrective and preventive measures are undertaken to mitigate the identified risks.

Formal Safety Committee is formed and operational in both the units thro' which work representatives can address their safety related issues during committee meetings.

Tool Box meetings are conducted regularly, wherein the workers can raise their safety issues to their managers.

Company has a separate safety department, comprising of a Safety Manager and trained safety executives, which does independent audit and champions the safety related programs across the organization.

D. Do the employees / workers of the entity have access to non-occupational medical and healthcare services? (Yes/ No).

Yes. All the employees are covered under the Group Personal Accident Policy taken by the Company with well recognized insurers. All employees, permanent and temporary and their family members, have access to company provided (thro' medical centers run by the company in around the plants) or company supported medical benefits.

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11 Details of safety related incidents, in the following format:

Safety Incident/Number	Category	FY 2024-25	FY 2023-24
Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked)	Employees	--	--
	Workers	--	--
Total recordable work-related injuries	Employees	--	--
	Workers	--	--
No. of fatalities	Employees	--	--
	Workers	3	--
High consequence work-related injury or ill-health (excluding fatalities)	Employees	--	--
	Workers	--	--

The Company's Safety Department carries out detailed investigations for all accidents, for both reportable and non-reportable to identify the root causes and to understand the measures to prevent recurrence. The learnings from all accidents are disseminated across the organization. Detailed presentation on Safety incidents / inquires / investigations / programs is made by the Safety Manager in the fortnightly Technical Review / Head-Of-Department Meetings, which is chaired by the Managing Director of the Company.

12 Describe the measures taken by the entity to ensure a safe and healthy work place.

Company runs comprehensive programs to ensure safe and healthy workplace and those programs covers the following : machineries and equipment safety, walkway and access staircases, storage tanks safety, work environment, work place illumination, comprehensive safety management system under ISO 45001, safety promotional activities, fire protection systems and training programs, emergency preparedness programs, emergency response teams. etc.

13 Number of Complaints on the following made by employees and workers:

	Category	FY 2024-25			FY 2023-24		
		Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
	Working Conditions	NIL					
	Health& Safety						

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14	Assessments for the year:			
		% of your plants and offices that were assessed (by entity or statutory authorities or third parties)		
	Health and safety practices	100%		
	Working Conditions	100%		
15	Provide details of any corrective action taken or underway to address safety-related incidents (if any) and on significant risks / concerns arising from assessments of health & safety practices and working conditions.			
	The Company periodically undergo assessment programs by independent third party assessors and follow-up actions are taken and reported to the Risk Management Committee, comprising of 2 Independent Directors and a wholetime of the Company.			
	Leadership Indicators			
1	Does the entity extend any life insurance or any compensatory package in the event of death of (A) Employees (Y/N) (B) Workers (Y/N).			
	Yes. In the unfortunate event of death of an employee, including workers, the company extends financial support to family members of the employee. All the permanent employees of the company are covered under the Group Personal Accident Insurance Policy taken by the Company. All the temporary employees of the company are covered under the Statutory Employees State Insurance (ESI) program.			
2	Provide the measures undertaken by the entity to ensure that statutory dues have been deducted and deposited by the value chain partners.			
	The bills raised by the service providers are settled by the company only on submission of proof by the service providers that the statutory dues have been deducted and deposited for all the contract workmen engaged in the company. These documents are also subject to the Internal Audit done by third party independent auditors, appointed by the Board of Directors of the Company.			
3	Provide the number of employees / workers having suffered high consequence work-related injury / ill-health / fatalities (as reported in Q11 of Essential Indicators above), who have been are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment:			
	Category	Total no. of affected employees / workers		No. of employees / workers that are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment
		FY 2024-25	FY 2023-24	FY 2024-25
		FY 2023-24		
	Employees	--	--	--
	Workers	3	--	1

4 Does the entity provide transition assistance programs to facilitate continued employability and the management of career endings resulting from retirement or termination of employment? (Yes/ No)

Yes. The company continually invests in human capital development which includes building skills and capabilities that are contemporary while providing employees with a diversity of experiences. These enhance the employability of the workforce and enable a smooth transition to alternate opportunities where sought. A large number of managerial employees are also retained as consultants, beyond their superannuation, to help them with continued financial support and this also enables the company and the new incumbent managers to be benefitted by the experience of the retiring personnel.

5 Details on assessment of value chain partners:

		% of value chain partners (by value of business done with such partners) that were assessed
	Health and safety practices	The key suppliers of the company are covered in the GreenCo Supply Chain Program and accordingly given awareness programs and undergo detailed evaluation by GreenCo auditors.
	Working Conditions	Also, the Company continue to be certified under four Standards of FSC, viz. FSC-STD-40-004 (Chain of Custody (COC) Certification), FSC-STD-40-005 (Requirements for Sourcing FSC Controlled Wood), FSC- STD-40 003 (COC certification of multiple sites) and FSC-STD-50-001 (Certificate Holder Trademark Requirements). By this, the Company assures its stakeholders that the wood and wood fibre (pulp) purchased by it are traceable to responsibly managed plantations and that adequate document controls are in place to ensure identification and traceability throughout the Chain of Custody. This also means that the Company is capable of manufacturing and selling 'FSC Mix' claim Products in the domestic and international markets.

6 Provide details of any corrective actions taken or underway to address significant risks / concerns arising from assessments of health and safety practices and working conditions of value chain partners.

Corrections actions are identified thro' periodic GreenCo and FSC audits, as mentioned above, and follow-up actions taken and reported.

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PRINCIPLE 4: Businesses should respect the interests of and be responsive to all its stakeholders

Essential Indicators	
1	Describe the processes for identifying key stakeholder groups of the entity.
	The Company engages with a broad spectrum of stakeholders to deepen its insights in to their needs and expectations and to develop sustainable strategies for the short, medium and long term. Stakeholder engagement also helps manage risks and opportunities in business operations. The key stakeholders identified are : Customers, Dealers (Indentors), Employees, shareholders, related academic institutions, supply chain partners, collaborators, industry bodies, Government, local communities, regulators and society at large.
2	List stakeholder groups identified as key for your entity and the frequency of engagement with each stakeholder group.

Stakeholder Group	Whether identified as Vulnerable & Marginalized Group (Yes/No)	Channels of communication (Email SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board website), other	Frequency engagement (Annually/ Half yearly/ Quarterly/ others - please specify)	Purpose and scope of engagement including key topics and concerns raised during such engagement
Customers	No	Emails, customer visits, relationship meetings and reviews	Continuous	Understanding customers' expectations and the gaps, if any, in company's product offerings.
Shareholders	No	Emails	Quarterly	Informing the shareholders about the performance indicators of the company and update them on company's strategies
Employees	No	Notices, Meetings, Newsletters	Continuous	<ul style="list-style-type: none"> Appraisals and feedback Career management Building a safety culture and inculcating safe work practices. On the Job training
Collaborators	No	Video Conferences, Meetings / Calls, visits	As and when needed	<ul style="list-style-type: none"> Stronger partnership. Joint development projects

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Stakeholder Group	Whether identified as Vulnerable & Marginalized Group (Yes/No)	Channels of communication (Email SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board website), other	Frequency engagement (Annually/ Half yearly/ Quarterly/ others - please specify)	Purpose and scope of engagement including key topics and concerns raised during such engagement
Academic Institutions	No	Academic Interface / Plant visits / Class sessions	As and when needed	Knowledge sharing and improving awareness about Paper, its eco-friendly use and paper manufacturing.
Industry Bodies	No	Conferences, Seminars, Meetings	Quarterly	For discussions on macro trends impacting Paper Industry
Government bodies and regulators	No	Meetings, visits	As and when needed	To ensure 100% compliance to all rules, regulations and laws
Local communities and society at large	No	Presentations, press conferences, media interviews, social welfare events	As and when needed	Understand areas of sustainable development; communicate on company's ESG initiatives and strategy; Implementation of CSR programs
Farmers / Aggregators / Supply Chain Partners	No	Visits by Company's managers; Awareness Meetings; One-to-One meetings	As and when needed	Review of supply performance; Green initiatives and updates; Price negotiations; Joint product developments / process upgradation; Project execution.

Leadership Indicators

- 1. Provide the processes for consultation between stakeholders and the Board on economic, environmental, and social topics or if consultation is delegated, how is feedback from such consultations provided to the Board.**

The Board of Directors of the Company, thro' the CSR committee, reviews, monitors and provides strategic direction to Company's CSR programs. The Company's fortnightly Review Meetings, chaired by the Chairman and Managing Director, reviews in greater details all the ESG initiatives of the company and the issues, if any, raised by any of the stakeholders of the organization.

- 2. Whether stakeholder consultation is used to support the identification and management of environmental, and social topics (Yes / No). If so, provide details of instances as to how the inputs received from stakeholders on these topics were incorporated into policies and activities of the entity.**

Company has an Environment Management team, headed by a person in Senior Management level. This team actively interacts with nearby villagers / government authorities and gets their feedback on the effectiveness of the company's ESG initiatives and ascertain their needs requiring support from the company. These are then formalized thro' the CSR programs of the company, which are reviewed and approved by the CSR Committee / the Directors.

- 3. Provide details of instances of engagement with, and actions taken to, address the concerns of vulnerable/ marginalized stakeholder groups.**

Based on the requirement stated by nearby villagers, the Company, for may years, has been supplying treated drinking water to near-by villages free of cost, to address the water needs for domestic use by the villagers.

Based on request received from Government schools, the company has constructed toilets, donated land, supplied new equipments free of cost for operation of Smart Class Rooms, supplied RO Water Plant to Panchayat Schools, supplied key medical equipments to Government Hospitals / Primary Health Centers etc.

The Company responded with financial support in Water Body development work and various other social works in Sivakasi, when request was received from "Sivakasi Green Forum".

The Company also runs 4 Community Health centers in nearby villages, providing medical treatment and free medicines.

As explained earlier, the company has a structured, innovative Lift Irrigation Scheme by which our treated waste water is used to irrigate nearly 1500 acres of land in which local farmers grow sugar cane.

The above are few of the instances of engagement with vulnerable / marginalized stakeholder groups.

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PRINCIPLE 5: Businesses should respect and promote human rights

Essential Indicators											
1	Employees and workers who have been provided training on human rights issues and policy(ies) of the entity, in the following format:										
Category		FY 2024-25				FY 2023-24					
		Total (A)	No. of employees / workers covered (B)		% (B/A)	Total (C)	No. of employees / workers covered (D)		% (D/C)		
Employees / Workmen											
Permanent		Through regular trade union meetings / ISO awareness sessions / on-the-job training sessions / GreenCo awareness meetings, all the employees have been provided training on sexual harassment, avoidance of discrimination, freedom of association, forced labour, child labour, etc.									
Other than permanent											
Total											
2	Details of minimum wages paid to employees, in the following format:										
Category		FY 2024-25				FY 2023-24					
		Total (A)	Equal to Minimum Wage		More than Minimum Wage		Total (D)	Equal to Minimum Wage		More than Minimum Wage	
			No. (B)	% (B/A)	No. (C)	% (C/A)		No. (E)	% (E/D)	No. (F)	% (F/D)
Permanent employees (other than workmen)											
Male		725	--	--	725	100%	715	--	--	715	100%
Female		13	--	--	13	100%	10	--	--	10	100%
Other than Permanent (Other then workmen)											
Male		322	--	--	322	100%	330	--	--	330	100%
Female		8	--	--	8	100%	9	--	--	9	100%
Permanent workmen											
Male		285	--	--	285	100%	301	--	--	301	100%
Female		0	--	--	0	100%	0	--	--	0	100%

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Category	FY 2023-24					FY 2022-23				
	Total (A)	Equal to Minimum Wage		More than Minimum Wage		Total (D)	Equal to Minimum Wage		More than Minimum Wage	
		No. (B)	% (B/A)	No. (C)	% (C/A)		No. (E)	% (E/D)	No. (F)	% (F/D)
Other than Permanent workmen										
Male	1131	1073	95%	58	5%	1095	1039	95%	56	5%
Female	187	187	100%	--	0%	150	150	100%	--	--

3 Details of remuneration/salary/wages, in the following format:

(a) Median remuneration / wages

	Male		Female	
	Number	Median remuneration/salary/ wages of respective category	Number	Median remuneration/salary/ wages of respective category
Board of Directors (BoD)	Refer Annexure VIII to Board's Report for report on Managerial Remuneration.			
Key Managerial Personnel				
Employees other than BoD and KMP	722	₹ 6.3 lakhs	13	₹ 2.0 lakhs
Workers	285	₹ 6.5 lakhs	--	--

b) Gross wages paid to females as % of total wages paid by the entity, in the following format:

	FY 2024-25	FY 2023-24
Gross wages paid to females as % of total wages	3.5 %	3.5 %

4 Do you have a focal point (Individual / Committee) responsible for addressing human rights impacts or issues caused or contributed to by the business? (Yes/No).

The HR Head of the respective units is responsible for addressing the human rights issues.

5 Describe the internal mechanisms in place to redress grievances related to human rights issues.

All grievances are addressed as and when received by the respective unit HR Heads thro' the Plant / department Heads. All the grievances are duly investigated and appropriate actions are taken to resolve the issue / complaint.

The Company has a structured grievance redressal mechanism, with 4 layers of managerial intervention in review / redressal of issues.

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6	Number of Complaints on the following made by employees and workers:					
	FY 2024-25			FY 2023-24		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Sexual Harassment	NIL					
Discrimination at workplace						
Child Labour						
Forced Labour / Involuntary Labour						
Wages						
Other human rights related issues						

7	Complaints filed under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Reprisal) Act, 2013, in the following format:		
		FY 2024-25	FY 2023-24
	Total Complaints reported under Sexual Harassment on of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH)	Nil	Nil
	Complaints on POSH as a % of female employees / workers	Nil	Nil
	Complaints on POSH upheld	Nil	Nil
8	Mechanisms to prevent adverse consequences to the complainant in discrimination and harassment cases.		
	The Company has a structured grievance redressal mechanism, with 4 layers of step-by-step managerial intervention to review / redressal of issues as well as to safeguard the identity and to prevent adverse consequences of the complainant.		
9	Do human rights requirements form part of your business agreements and contracts? (Yes/No)		
	Yes. The contract / agreements with suppliers / service providers, which involve supply of labour, addresses the human rights requirements.		

10 Assessments for the year:

	% of your plants and offices that were assessed (by entity or statutory authorities or third parties)
Child labour	100%.
Forced/involuntary labour	The company undertakes internal assessment thro' its HR and IR function
Sexual harassment	
Discrimination at workplace	
Wages	
Others - please specify	

11 Provide details of any corrective actions taken or underway to address significant risks / concerns arising from the assessments at Question 9 above.

No significant risks / concerns observed in internal evaluations.

Leadership Indicators

1. Details of a business process being modified / introduced as a result of addressing human rights grievances/complaints.

No complaint has been received for human rights violation.

2. Details of the scope and coverage of any Human rights due-diligence conducted.

Internal assessment covers all plant locations and offices.

3. Is the premise/office of the entity accessible to differently abled visitors, as per the requirements of the Rights of Persons with Disabilities Act, 2016?

Our establishments / offices are accessible to the differently abled and we are continuously working towards improving infrastructure for eliminating barriers to accessibility.

4. Details on assessment of value chain partners:

	% of your plants and offices that were assessed (by entity or statutory authorities or third parties)
Sexual Harassment	Currently, this is not being addressed.
Discrimination at workplace	However, the company's suppliers Code of Conduct addresses many of these aspects.
Child Labour	
Forced Labour/Involuntary Labour	
Wages	
Others - please specify	

5. Provide details of any corrective actions taken or underway to address significant risks / concerns arising from the assessments at Question 4 above.

Not applicable.

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PRINCIPLE 6: Businesses should respect and make efforts to protect and restore the environment

Essential Indicators

1. Details of total energy consumption (in Joules or multiples) and energy intensity, in the following format

Parameter	FY 2024-25	FY 2023-24
From renewable sources (GJ)		
Total electricity consumption(A)	4,23,872	4,42,843
Total fuel consumption (B)	41,41,672	43,54,916
Energy consumption through other sources(C)		
Total energy consumed from renewable sources(A+B+C)	45,65,544	47,97,759
From non-renewable sources(GJ)		
Total electricity consumption (D)	5,71,669	5,36,589
Total fuel consumption (E)	31,68,382	31,43,976
Energy consumption through other sources (F)	0	0
Total energy consumed from non-renewable sources (D+E+F)	37,40,051	36,80,565
Total energy consumed (A+B+C +D+E+F)	83,05,595	84,78,324
Energy intensity per rupee of turnover (Total energy consumed in GJ / Revenue from operations)	0.00047	0.00048
Energy intensity per tonne of Paper produced (Total energy consumed in GJ / Total Production in tonnage)	33.7	35.3

Note: Indicate if any independent assessment / evaluation / assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.

Yes. Energy Audits are done periodically by external energy auditors, certified by BEE.

2. Does the entity have any sites / facilities identified as designated consumers (DCs) under the Performance, Achieve and Trade (PAT) Scheme of the Government of India? (Y/N) If yes, disclose whether targets set under the PAT scheme have been achieved. In case targets have not been achieved, provide the remedial action taken, if any.

Both the units of the company are covered the PAT Scheme of Govt. of India. In both the units, PAT cycle targets have been achieved.

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3. Provide details of the following disclosures related to water, in the following format:

Parameter	FY 2024-25	FY 2023-24
Water withdrawal by source (in kilolitres)		
(i) Surface water	109.2 lakh KL	113.5 lakh KL
(ii) Groundwater	--	0.008 KL
(iii) Third party water	--	--
(iv) Seawater / desalinated water	--	--
(v) Others		
Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v)	109.2 lakh KL	113.5 lakh KL
Total volume of water consumption (in kilolitres)	109.2 lakh KL	113.5 lakh KL
Water intensity per rupee of turnover (Water consumed / revenue from operations)	0.00062 litre per Rupee of turnover	0.00063 litre per Rupee of turnover
Water intensity per tonne of Paper produced (Water consumed / Paper Production in tonnage)	44.29 KL	47.23 KL

Note: Indicate if any independent assessment / evaluation / assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency. No

4. Provide the following details related to water discharged:

Parameter	FY 2024-25	FY 2023-24
Water discharge by destination and level of treatment (in kilolitres)		
(i) To Surface water		
- No treatment		
- With treatment		
(ii) To Groundwater		
- No treatment		
- With treatment		
(iii) To Seawater		
- No treatment		
- With treatment		
(iv) Sent to third-parties		
- No treatment		
- With treatment	6740262 KL	7080243 KL

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Parameter	FY 2024-25	FY 2023-24
(v) Others		
- No treatment		
- With treatment		953008 KL
Total water discharged (in kilolitres)	6740262 KL	8033251 KL

Note: Indicate if any independent assessment / evaluation /assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.- No

5. Has the entity implemented a mechanism for Zero Liquid Discharge? If yes, provide details of its coverage and implementation.

- The Company practices ZLD in its Unit : Tirunelveli, where treated waste water, after recycled / reused in the process and discharged, is used for plantation within the mill premises.
- The Company's unit in Erode is an integrated pulp and paper mill. The practice of ZLD has not been achieved in any integrated pulp and paper mill so far (Reference : Central Pulp & Paper Research Institute (CPPRI), Saharanpur, report on the subject).
- Also, the company, in its Erode unit, has a structured, innovative Lift Irrigation Scheme by which our treated waste water is used to irrigate nearly 1500 acres of land in which local farmers grow sugar cane. The sugar cane produced is procured by our associate Company viz. Ponni Sugars (Erode) Limited which in turn gives bagasse, a residue left after extraction of sugar from sugar cane. Bagasse is used by our Company to produce paper, and in turn, our Company gives treated waste water to the farmers to grow sugar cane. This tripartite arrangement between our Company, Ponni Sugars (Erode) Limited and the nearby Farmers has been in operation for over 35 years. This innovative Lift Irrigation Scheme is a unique and innovative irrigation scheme and has caught the attention of Overseas Experts and UNDP as a Role Model.

6. Please provide details of air emissions (other than GHG emissions) by the entity, in the following format:

Parameter	Unit	FY 2024-25	FY 2023-24
NOx - Erode unit	Mg/nm ³	38.5	30.5
SOx - Erode unit	Mg/nm ³	39.1	94.0
Particulate matter (PM) - Erode unit	Mg/nm ³	36.0	21.5
NOx - Tirunelveli unit	Mg/nm ³	11.5	39.71
SOx - Tirunelveli unit	Mg/nm ³	24.8	32.0
Particulate matter (PM) - Tirunelveli unit	Mg/nm ³	18.8	47.31

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.

Yes. Assessments carried out by TNPCB (Advance Environmental Laboratory) - For both units, Enviro Care Laboratory (Madurai) - For Tirunelveli unit and Excellence Care Laboratory (Madurai) - For Tirunelveli unit.

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7. Provide details of greenhouse gas emissions (Scope 1 and Scope 2 emissions) & its intensity, in the following format:

Parameter	Unit	FY 2024-25	FY 2023-24
Total Scope 1 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available)	Metric tonnes of CO ₂ equivalent	373531	380995
Total Scope 2 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available)	Metric tonnes of CO ₂ equivalent	109634	114904
Total Scope 1 and Scope 2 emission intensity per rupee of turnover (Total Scope 1 and Scope 2 GHG emissions / Revenue from operations)	Metric tonnes of CO ₂ equivalent	0.000028 per Rupee of Turnover	0.000028 per Rupee of Turnover
Total Scope 1 and Scope 2 emission intensity per tonne of Paper produced (Total Scope 1 and Scope 2 GHG emissions / Paper Production in Tonnage)	Metric tonnes of CO ₂ equivalent	1.96 per MT	2.07 per MT

Note: Indicate if any independent assessment / evaluation /assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.

Yes. By Excellence Laboratory (Madurai) for Unit : Tirunelveli.

8. Does the entity have any project related to reducing Green House Gas emission? If Yes, then provide details.

The Company continuously works on reduction in usage of fossil fuel, thro' increased use of bio-fuels.

In FY 2022-23, the Company has installed a PCC (Precipitated Calcium Carbonate) Plant capturing the CO₂ from the Stack of the Lime Kiln, reducing thereby the overall emission of GHG from the unit.

The following projects are under evaluation for reducing GHG :

- Exploring the possibilities to utilize available biomass within the system and use it as fuel.
- For Heat utilisation from coal fired boiler's flue gas to dry biomass, we are working with Energy Efficiency Services Limited(EESL). EESL has completed the bidding process for the LGWHR solution & all formalities are expected to be completed shortly.
- We are installing one more soot blower in the super heater zone in CPP to further step up usage of biomass.

The Company has recently partnered with and has entered into Share Purchase Agreement (SPA), Share Subscription & Shareholders' Agreement (SSSHA), Energy Supply Agreement and Performance Incentive Agreement with M/s.Ganeko Solar Private Limited (GSPL) (the Indian subsidiary / affiliate of Zelestra Corporacion S.A.U, Spain) and M/s.Navia One Power Private Limited (SPV promoted by GSPL) for the purpose of meeting the Solar Power & Wind Power requirements of the Company. The Solar and Wind power from the SPV is expected to be available by end of FY26.

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9. Provide details related to waste management by the entity, in the following format:

Parameter	FY 2024-25	FY 2023-24
Total Waste generated (in metric tonnes)		
Plastic waste (A)	909.91	739.5
E-waste (B)	3.28	0.92
Bio-medical waste (C)	--	--
Construction and demolition waste (D)	--	--
Battery waste (E)	--	--
Radioactive waste (F)	--	--
Other Hazardous waste.(G)	89694	73935
Other Non-hazardous waste generated (H). Please specify, if any. (ESP ash)	14586	16575
Total (A+B+C+D+E+F+G+H)	105194	91250
Waste intensity per rupee of turnover (Total waste generated / Revenue from operations)	0.000006 per Rupee of Turnover	0.000005 per Rupee of Turnover
Waste intensity per tonne of Paper Produced (Total waste generated / Total Production in tonnage)	0.426 per MT	0.379 per MT
Waste intensity in terms of physical output		
Waste intensity (optional) - the relevant metric may be selected by the entity		
For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tonnes)		
Category of waste		
(i) Recycled	--	--
(ii) Re-used	--	--
(iii) Other recovery operations	--	--
Total	--	--
For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)		
Category of waste		
(i) Incineration	--	--
(ii) Landfilling	--	--
(iii) Other disposal operations	105194	91250
Total	105194	91250

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency. No.

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- 10. Briefly describe the waste management practices adopted in your establishments. Describe the strategy adopted by your company to reduce usage of hazardous and toxic chemicals in your products and processes and the practices adopted to manage such wastes.**

The Company is certified under ISO 14001:2015 and the scope covers its entire operations. Under the Environmental Management System, the company has guidelines for comprehensive waste management for the identification, segregation, collection, recycling and final disposal.

- 11. If the entity has operations/offices in/around ecologically sensitive areas (such as national parks, wildlife sanctuaries, biosphere reserves, wetlands, biodiversity hotspots, forests, coastal regulation zones etc.) where environmental approvals / clearances are required, please specify details in the following format:**

The Company doesn't have operations in above mentioned ecologically sensitive areas. Both the units of the company have obtained the requisite environmental clearances.

Sl. No.	Location of operations / offices	Type of operations	Whether the conditions of environmental approval / clearance are being complied with? (Y/N) If no, the reasons thereof and corrective action taken, if any.
1	Unit Erode	Industrial Facility	Yes
2	Unit Tirunelveli	Industrial Facility	Yes

- 12. Details of environmental impact assessments of projects undertaken by the entity based on applicable laws, in the current financial year:**

Name and brief details of project	EIA Notification No	Date	Whether conducted by independent external agency (Yes/No)	Results communicated in public domain (Yes/No)
NIL				

- 13. Is the entity compliant with the applicable environmental law/ regulations/ guidelines in India; such as the Water (Prevention and Control of Pollution) Act, Air (Prevention and Control of Pollution) Act, Environment protection act and rules thereunder (Y/N). If not, provide details of all such non-compliances, in the following format:**

Both the units of the company follow the applicable environmental law / regulations / guidelines in India such as Water (Prevention and Control of Pollution) Act, Air (Prevention and Control of Pollution Act), Environment Protection Act and rules thereunder. No cases of non-compliances have been observed in FY 2024-25.

Leadership Indicators

1. Please provide details of total Scope 3 emissions & its intensity, in the following format:

Parameter	Unit	FY 2024-25	FY 2023-24
Total Scope 3 emissions (Break-up of the GHG into CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , if available)	Metric tonnes of CO ₂ equivalent	26036	33907
Total Scope 3 emissions per rupee of turnover		0.0000019 per rupee of turnover	0.0000019 per rupee of turnover

* This is measured to the extent possible and reported herewith.

Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.

No

2. With respect to the ecologically sensitive areas reported at Question 11 of Essential Indicators above, provide details of significant direct & indirect impact of the entity on biodiversity in such areas along-with prevention and remediation activities.

Not applicable

3. If the entity has undertaken any specific initiatives or used innovative technology or solutions to improve resource efficiency, or reduce impact due to emissions / effluent discharge / waste generated, please provide details of the same as well as outcome of such initiatives, as per the following format:

Sl. No.	Initiative undertaken	Details of the initiative (Web-link, if any, may be provided along-with summary)	Outcome of the initiative
Refer the annexure to Board's report on Conservation of Energy			

4. Does the entity have a business continuity and disaster management plan? Give details in 100 words/ web link.

Yes. The Company has a Business Continuity, Emergency Preparedness and Disaster Management Plan designed to address the threat of disruptions to business activities or processes. The Business Continuity Plans validates the adequacy of the existing systems and processes to prevent and recover from potential threats.

5. Disclose any significant adverse impact to the environment, arising from the value chain of the entity. What mitigation or adaptation measures have been taken by the entity in this regard.

No significant adverse impact reported by any value chain partners.

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6. Percentage of value chain partners (by value of business done with such partners) that were assessed for environmental impacts.

100% of the wood suppliers are covered under FSC audits, as mentioned earlier. Suppliers for other materials have not been formally assessed by the company, for environmental impacts.

PRINCIPLE 7: Businesses, when engaging in influencing public and regulatory policy, should do so in a manner that is responsible and transparent.

Essential Indicators		
1.	a. Number of affiliations with trade and industry chambers / associations.	
	b. List the top 10 trade and industry chambers/ associations (determined based on the total members of such body) the entity is a member of/ affiliated to.	
Sl. No.	Name of the trade and industry chambers/ associations	Reach of trade and industry chambers/ associations (State/National)
1	Confederation of Indian Industry	National
2	Indian Pulp and Paper Technology Association	National
3	Indian Paper Manufacturers Association	National
4	Indo American Chamber of Commerce	National
5	Indo German Chamber of Commerce	National
6	National Safety Council	National
7	Employers Federation of Southern India	National
8	Indian Agro & Recycled Paper Manufacturers association	National
9	Federation of Indian Export Organisation	National
10	CAPEXIL	National
2.	Provide details of corrective action taken or underway on any issues related to anti-competitive conduct by the entity, based on adverse orders from regulatory authorities.	
Name of authority		Corrective action taken
Competition Commission of India		Allegation, leveled against large paper manufacturers in India (including our Company) of simultaneous price increases during the period January 2012 - December 2013, is currently under evaluation by the Competition Commission of India.

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Leadership Indicators

1. Details of public policy positions advocated by the entity:

Sl. No.	Public Policy advocated	Method resorted for such advocacy	Whether information available in public domain? (Yes/No)	Frequency of Review by Board	Web link, if available
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Given the Company's experience and expertise over more than 6 decades, the company proactively, thro' the associations in which it has membership, engages with various stakeholders and provide its inputs on various areas such as renewable energy space, health and safety, etc.

Over the years, the company's wholetime directors have played key roles in leading industry associations. The Company is committed to engage in the public policy advocacy process in a responsible and ethical manner.

PRINCIPLE 8: Businesses should promote inclusive growth and equitable development.

Essential Indicators

1. Details of Social Impact Assessments (SIA) of projects undertaken by the entity based on applicable laws, in the current financial year.

Name and brief details of project	SIA Notification No.	Date of notification	Whether conducted by independent external agency (Yes/No)	Results communicated in public domain (Yes/No)	Relevant Web link
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None of the projects undertaken by the company in FY 2024-25 require Social Impact Assessments.

2. Provide information on project(s) for which ongoing Rehabilitation and Resettlement (R&R) is being undertaken by your entity, in the following format:

Sl. No.	Name of Project for which R&R is ongoing	State	District	No. of Project Affected Families (PAFs)	% of PAFs covered by R&R	Amount paid to PAFs in the FY (In INR)
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Not applicable

3. Describe the mechanisms to receive and redress grievances of the community.

Company has an Environment Management team, headed by a person in Senior Management level. This team actively interacts with nearby villagers / government authorities and gets their feedback on the effectiveness of the company's ESG initiatives and ascertain their needs requiring support from the company. These are then formalized thro' the CSR programs of the company, which are reviewed and approved by the CSR Committee / the Directors.

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4. Percentage of input material (inputs to total inputs by value) sourced from suppliers:

	FY 2024-25	FY 2023-24
Directly sourced from MSMEs / small producers	51% approx.	13% approx.
Directly from within India	86% approx.	78% approx.

5. Job creation in smaller towns - Disclose wages paid to persons employed (including employees or workers employed on a permanent or non-permanent / on contract basis) in the following locations, as % of total wage cost.

Location	FY 2024-25	FY 2023-24
Rural	--	--
Semi-urban	2671*	2610*
Urban	--	--
Metropolitan	--	--

* Total headcount at the end of the year and includes contract employees

Leadership Indicators

1 Provide details of actions taken to mitigate any negative social impacts identified in the Social Impact Assessments (Reference: Question 1 of Essential Indicators above):

Details of negative social impact identified	Corrective action taken
Not applicable.	

2 Provide the following information on CSR projects undertaken by your entity in designated aspirational districts as identified by government bodies:

Sl. No.	State	Aspirational District	Amount spent (In INR)
Refer Annexure - VII to Board's Report for details on CSR activities.			

3 (a) Do you have a preferential procurement policy where you give preference to purchase from suppliers comprising marginalized / vulnerable groups? (Yes/No)

The Company is committed to collaborate with small farmers (growing varieties of wood for pulping), by supplying them Clones / seedlings at concessional rates and also enters contracts with them to buyback wood at Minimum Support Prices or Ruling market prices, whichever is higher.

(b) From which marginalized /vulnerable groups do you procure?

Refer note given above.

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(c) What percentage of total procurement (by value) does it constitute?

Our procurement from small farmers, direct and thro' aggregators, represent about 30% of our total wood procurement for the year.

4 Details of the benefits derived and shared from the intellectual properties owned or acquired by your entity (in the current financial year), based on traditional knowledge:

Sl. No.	Intellectual Property based on traditional knowledge	Owned / Acquired (Yes/No)	Benefit shared (Yes/No)	Basis of calculating benefit share
Not applicable				

5 Details of corrective actions taken or underway, based on any adverse order in intellectual property related disputes wherein usage of traditional knowledge is involved.

Name of authority	Brief of the Case	Corrective action taken
Not applicable.		

6 Details of beneficiaries of CSR Projects:

Sl. No.	CSR Project	No. of persons benefitted from CSR Projects	% of beneficiaries from vulnerable and marginalized groups
Refer Annexure - VI to Board's Report for details on CSR activities.			

PRINCIPLE 9: Businesses should engage with and provide value to their consumers in a responsible manner.

Essential Indicators

1. Describe the mechanisms in place to receive and respond to consumer complaints and feedback.

A well established system is in place for dealing with consumer feedback. Customers are provided multiple options to connect with the company through email, telephone, feedback forms, personal visit by company's branch officers / managers, etc.

In addition, the Top management team conducts quarterly dealers' conference wherein all the dealers (Indentors as called by the company) participate and have both group discussions / one-to-one discussion with the Top Management team. This particular initiative has been extremely effective and important for the Top Management team of the company to receive direct unfiltered feedback on the company's products, quality issues, logistics issues if any and so on.

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- 2. Turnover of products and/ services as a percentage of turnover from all products/ service that carry information about Environmental and social parameters relevant to the product, safe and responsible usage and recycling and / or safe disposal.**

	As a percentage to total turnover
Environmental and social parameters relevant to the product	Products of the company contain all relevant information as required under applicable laws.
Safe and responsible usage	
Recycling and/or safe disposal	

- 3 Number of consumer complaints in respect of the following:**

	FY 2024-25		Remarks	FY 2023-24		Remarks
	Received during year	Pending resolution at end of year		Received during year	Pending resolution at end of year	
Data privacy	—	—		—	—	
Advertising	—	—		—	—	
Cyber-security	—	—		—	—	
Delivery of essential services	—	—		—	—	
Restrictive Trade Practices	—	—		—	—	
Unfair Trade Practices	—	—		—	—	
Others **	73	6		77	3	

** All these complaints relate to either product not meeting customer expectation on the product performance or logistics gaps like wrong supply / short supply. Company has robust systems put in place to address these issues on priority basis directly and thro' the company's dealer network.

- 4 Details of instances of product recalls on account of safety issues:**

	Number	Reasons for recall
Voluntary recalls	NIL	
Forced recalls		

- 5 Does the entity have a framework/ policy on cyber security and risks related to data privacy? (Yes/No) If available, provide a web-link of the policy.**

The Company's ERP (Database and applications) is fully operational in the Cloud Network and accordingly the company doesn't have any requirement for On-Premises Cyber Security and Risk policy. The Company's ERP is fully governed by the cyber security frameworks / audit trails programs / logics provided by the Cloud Service Providers (Oracle and AWS).

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	Also, the company has a framework / policy on cyber security and risks related to data privacy, available at www.spbltd.com .
6	<p>Provide details of any corrective actions taken or underway on issues relating to advertising, and delivery of essential services; cyber security and data privacy of customers; re-occurrence of instances of product recalls; penalty / action taken by regulatory authorities on safety of products / services.</p> <p>Nil</p>
7	<p>Provide the following information relating to data breaches:</p> <p>a) Number of instances of data breaches : Nil</p> <p>b) Percentage of data breaches involving personally identifiable information of customers : Nil</p> <p>c) Impact, if any, of the data breaches : Not Applicable</p>
Leadership Indicators	
1	<p>Channels / platforms where information on products and services of the entity can be accessed (provide web link, if available).</p> <p>Details available at https://www.spbltd.com/products/index.html</p>
2	<p>Steps taken to inform and educate consumers about safe and responsible usage of products and/or services.</p> <p>The company's communications are aimed at enabling consumers to make informed purchase decisions. The company also makes efforts to educate consumers on responsible usage of its products and services.</p>
3	<p>Mechanisms in place to inform consumers of any risk of disruption / discontinuation of essential services.</p> <p>The company operates dedicated web portals for the company's indentors, thro' which necessary informations are shared. The company also operates WhatsApp Group facilities to get in touch with Indentors / Customers.</p>
4	<p>Does the entity display product information on the product over and above what is mandated as per local laws? (Yes/No/Not Applicable) If yes, provide details in brief. Did your entity carry out any survey with regard to consumer satisfaction relating to the major products / services of the entity, significant locations of operation of the entity or the entity as a whole? (Yes/No)</p> <p>Product Information displayed on the products, as required under applicable laws.</p> <p>The Central Marketing Office and the Branch Offices spend a lot of time and attention on product information, labelling and customer engagement. The quarterly Indentor conferences act as a major event for discussions on all points concerning products, quality, complaints etc.</p>